

## **SWEEP PRIVACY POLICY**

### **Introduction**

This privacy policy ("**Privacy Policy**") explains how Sweep AI, Inc. ("**Sweep**") handles your personal data. "**Personal Data**" is information that identifies or can reasonably be linked directly or indirectly to an identifiable person. The privacy practices and standards detailed in this Privacy Policy apply to all data subjects globally, unless specifically noted otherwise. This Privacy Policy applies to the Sweep's websites ("**Websites**") and software products and services (collectively "**Services**").

### **What Personal Data does Sweep collect about me?**

The categories of Personal Data collected by Sweep change depending on the Services you use and whether those Services are free or paid. We describe below which Services correlate with the processing in each Personal Data category.

### **Information You Provide Directly**

We collect the Personal Data you provide to us, for example:

*Account Information:* When you register for an account with Sweep, we collect information that identifies you such as your name, username, email address and password. This is collected for free and paid users of the Services.

*Profile Information:* We collect information that you voluntarily provide in your user profile; this may include your name, address, email address, company/organization and other identifying information.

*Payment Information :* If you purchase a paid subscription from Sweep, we will collect payment information from you that may include your name, billing address and credit card or bank information. We may also use your credit card information to verify your identity and prevent abuse of our pipelines. Please note that Sweep does not directly process or store your entire credit card number, but we do direct that information to our third-party payment processors for processing.

*Marketing Contact Information :* If you request Sweep to contact you, or sign up for marketing materials or events, Sweep may collect information such as name, address, email address, telephone number, company name, and size of company. This may be collected through the Websites as well as through the use of the Services.

*Licensee Information :* We collect licensee name, email address, and similar information associated with the individual that receives a license key for the paid users of the Services.

*Content you provide through the use of the Services :* Examples of content we collect and store include but are not limited to: the summary and description added to an issue, your repositories, commits, project contributions, profile metadata, activity data, and comments. Content also includes any code, files and links you upload to the Services.

*Customer Support and Professional Services* : If you contact Sweep customer support or receive professional services, we will collect information about you related to your account and to the requests you are making or the services being provided.

*Call Recordings* : We may record and transcribe sales calls hosted on various videoconferencing technologies to enable our sales and support teams to share conversational insights, create training and presentations, and improve their internal processes.

*Other Content You Submit* : We may also collect other content that you submit to our Services. For example: feedback, comments and blog posts, or when you participate in any interactive features, surveys, contests, promotions, prize draws, activities or events. When you participate in interactive channels, we may collect and process information for demographic analysis. Such collection is not tied to any specific products, but may be collected through the Websites.

### **Information About Your Use of the Services We Collect Automatically**

We may collect certain Personal Data automatically through your use of the Services, for example:

*Device Information and Identifiers*: When you access and use our Services, we automatically collect information about your device, which may include: device type, your device operating system, browser type and version, language preference, IP address, hardware identifiers, and mobile IDs. This information may be collected through any use of the Services.

*Subscription Data*: We may automatically collect information about the number of active users, licensing timetables, historical user count, and IP address.

*Services Usage Data*: Services Usage Data is broken into two categories: Optional Data and Operational Data. Optional Data is aggregated metrics regarding activity and feature usage that provide insights into the success of stages and features. Operational Data is aggregated metrics that track how value is delivered through the use of the Services and provide insights into optimal customer implementation. Both categories of Services Usage Data can be tied to the instance hostname, but the information does not contain any other individual user data.

*Events Data*: In addition to Services Usage Data, Sweep also uses event analytics, such as browsing duration, page clicks and page views, in a pseudonymized form to gain insights into end-to-end user behavior.

*Website Usage Data*: When you visit our Websites, we automatically log information about how you interact with the sites, such as the referring site, date and time of visit, and the pages you have viewed or links you have clicked.

*Cookies and Similar Tracking Technologies*: Sweep uses cookies and similar technologies to provide functionality, such as storing your settings, and to recognize you as you use our Services. In addition, we use cookies to gather information to provide interest-based advertising which is tailored to you based on your online activity. Please review our Cookie Policy below to learn about our practices and the controls we provide you.

*Email marketing:* When we send you emails, they may include technology such as a web beacon, that tells us your device type, email client, and whether you have received and opened an email, or clicked on any links contained in the email.

### **Information from Third-Parties and Partners**

We may collect Personal Data from other parties in the following ways:

*Vendors and Partners:* We may receive information about you from third-parties such as vendors, resellers, partners, or affiliates. For example, we receive information from our resellers about you and your orders, or we may supplement the data we collect with demographic information licensed from third-parties in order to personalize the Services and our offers to you. Likewise, our sales, marketing, and recruiting teams may receive access to third-party databases containing information to enrich business contacts and other corporate data, or we may receive social listening data from companies that monitor public posts.

*Third-Party sign-in services:* Sweep may allow you to sign up for/in to our Services using third-party accounts, such as Facebook or Google. When you give permission for this to happen, Sweep will receive information about you from your third-party account, such as name, email address, location and demographic information.

*Other users of the Services:* Other users of the Services may provide information about you when they submit issues and comments, or we may receive information when you are designated as a representative or administrator on your company's account.

When you are asked to provide personal data, you may decline. And you may use web browser or operating system controls to prevent certain types of automatic data collection. But if you choose not to provide or allow information that is necessary for certain products or features, those products or features may not be available or function correctly.

### **What Personal Data is Not Collected by Sweep?**

Sweep does not intentionally collect sensitive Personal Data, such as social security numbers, genetic data, health information, or religious information. Although Sweep does not request or intentionally collect any sensitive Personal Data, we realize that users might store this kind of information in a Sweep repository.

Sweep does not intentionally collect the Personal Data of individuals that are stored in users' repositories or other free-form content inputs. If Personal Data is stored in a user repository then the repository owner is responsible for its processing.

If you are a child under the age of 13, you may not have an account. With the exception of Educational Licenses, Sweep does not knowingly collect information from, or direct any of our Services to, children under 13. If we learn or have reason to suspect that a user is under the age of 13, we will close the child's account.

### **How does Sweep use my Personal Data?**

Sweep uses your Personal Data for the following purposes:

- To create your account, identify and authenticate your access to the Services and provide you with the Services you have requested;
- To process your payment for the Services you have purchased;
- To understand how our Services are used and to improve our Services;
- To provide personalized experiences;
- To conduct user research and development;
- To send you important information about the Services;
- To send you information you have requested;
- To create digital productions and manage events;
- To provide trainings and learning opportunities;
- To enable partners to register and track deals;
- To respond to your requests for customer support;
- To detect, prevent, or otherwise address fraud and abuse to protect you, Sweep, and third-parties;
- To enforce the legal terms that govern our Services;
- To comply with our legal obligations;
- To protect the rights, safety and property of Sweep, you, or any third-party; and
- For other purposes, for which we obtain your consent.

### **Legal Basis for the Processing of your Personal Data**

When our processing is subject to international laws, including but not limited to the General Data Protection Regulation ("**GDPR**") that governs individuals located in the European Economic Area ("**EEA**"), we collect and process your Personal Data using one or more of the following legal bases set out by applicable law:

*Performance of a contract:* We use your Personal Data to provide the Services you have subscribed to, and to complete and administer the contract you have entered into with Sweep and any agreement to process payment information.

*Legitimate Interests:* We use your Personal Data for our legitimate interests, such as to provide you with relevant content, communicate with business leads, improve our products and services, and for administrative, security, fraud prevention and legal purposes. You may object to the processing of your Personal Data for these purposes at any time.

*Consent:* We may use your Personal Data, with your consent, for specific purposes such as marketing, surveys, call recordings, and research. You may withdraw your consent for the specific purpose or object to the processing of your Personal Data at any time.

*Compliance with a Legal Obligation:* We may use your Personal Data in connection with legal claims, regulatory compliance, and audits.

### **With Whom does Sweep share my Personal Data?**

*Sharing with Managed Accounts and Administrators:* If you have created a Sweep account with your corporate email address, we may share your Personal Data with your Company if your Company enters

into a commercial relationship with Sweep. If this happens, then your use of the software and your account is subject to the terms and any data protection agreement between your Company and Sweep. In the event you change the email address on your account from a corporate email address to a personal email address and, thereafter, your Company enters into a commercial relationship with Sweep, your Personal Data related to that account will not be shared with your Company. Sweep will not link an account to a Company based on retroactive use of a corporate email.

In addition, if you choose to become a member of a project, your username, email address, IP address, the date when access was granted, the date when access expires, and your access role will be shared with the group owners of that project.

*Sharing with Service Providers:* We share your Personal Data with our service providers. These are companies who provide services on our behalf, such as hosting our Services, marketing, advertising, social, analytics, support ticketing, credit card processing, security and other such similar services. These companies are subject to contractual requirements that govern the security and confidentiality of your information.

For example, we use analytics providers, such as Google Analytics, to help us understand the operation and performance of our Services. To learn about how Google uses and shares data it collects through its services, please visit <https://www.google.com/policies/privacy/partners/>.

*Sharing with Partners and Resellers:* Sweep works with third-parties who provide sales, consulting, support and technical services for our Services. Where permitted and with your consent (if required), we may share your data with these partners and resellers.

*Sharing for Fraud and Prevention Abuse:* We may share your information when we have a good faith belief that the disclosure is necessary to prevent fraud, abuse of our services, defend against attacks, and to protect the safety of Sweep and our users.

*Law Enforcement:* Sweep may disclose Personal Data or other information we collect about you to law enforcement if required in response to a valid subpoena, court order, search warrant, a similar government order, or when we believe in good faith that disclosure is necessary to comply with our legal obligations, to protect our property or rights, or those of third-parties or the public at large.

*Merger or Acquisition:* We may share your Personal Data if we are involved in a merger, sale, or acquisition of corporate entities or business units. If any such change of ownership happens, we will ensure that it is under terms that preserve the confidentiality of your Personal Data, and we will notify you on our website or by email before any transfer of your Personal Data.

### **Sharing Personal Data across National Borders**

Our Services are hosted in the United States and information we collect will be stored and processed on our servers in the United States. Our employees, contractors, affiliated organizations, service providers, and sub-processors that process Personal Data may be located in the United States or other countries outside of your home country. If you reside in the EEA, United Kingdom, or Switzerland, and we transfer information about you to a jurisdiction that has not been found by the European Commission to have adequate data protections, we will use available safeguards and legal mechanisms to help ensure your rights and protections, including using Standard Contractual Clauses or obtaining your consent.

## **Data Retention**

In order to protect your Personal Data, Sweep will only retain your Personal Data for as long as your account is active or as needed to perform our contractual obligations, provide you the Services, comply with legal obligations, resolve disputes, preserve legal rights, or enforce our agreements.

Sweep reserves the right to delete inactive accounts, projects, namespaces, and associated content. Sweep may deem an account, project, or namespace inactive based on various criteria, including, but not limited to, the account creation date, the last time there was a valid log-in, and the date of the last contribution. If we plan to delete your account or projects, we will provide advance notice by sending a message to the email address registered to your account. Sweep encourages you to utilize your account on occasion to avoid the risk of being deemed inactive.

## **What are my rights and choices regarding Personal Data?**

You have the right to access, correct, restrict or delete your Personal Data, and to port your Personal Data to another company. While these rights may vary by jurisdiction, Sweep provides you with the same rights and choices, no matter where you live. We provide these rights free of charge unless your requests are manifestly unfounded and excessive.

You may exercise your choices and rights as follows:

*To opt out of email marketing:* You may opt-out of email marketing by clicking the “unsubscribe” link located at the bottom of any marketing email you receive or by emailing us at [legal@sweep.dev](mailto:legal@sweep.dev). You may continue to receive transactional email messages about your account and the Service after you have unsubscribed.

*To opt-out of Interest-based advertising:* If you wish to opt-out of interest-based advertising, please visit the Cookie Policy to see your options.

## **Statement Changes**

Sweep may change this Privacy Policy from time to time. If we decide to make a significant change to our Privacy Policy, we will post a notice of the update on the homepage of our Website.

## **Contact Us**

If you have questions or concerns about the way we are handling your Personal Data, please email us with the subject line "Privacy Concern" at [legal@sweep.dev](mailto:legal@sweep.dev).

*Last updated: March 15, 2024*

## **SWEEP COOKIE POLICY**

This Cookie Policy supplements the information contained in our Privacy Statement and explains how we use cookies and related technologies to manage and provide our Sweep websites, products and services; collectively referred to as the "**Services**."

Cookies are small text files placed on your computer. Pixels are small amounts of code on a web page or in an email that provide a method to deliver content, such as a graphic image on a webpage.

### **Why do we use Cookies?**

Sweep uses cookies to:

- Help you to access and use the Services;
- Understand how visitors use and engage with our Services;
- Set your preferences;
- Deliver relevant interest-based advertising;
- Understand if you have opened an email and acted upon it; and
- Analyze and improve our Services.

### **Who sets Cookies on Sweep?**

Cookies are sometimes placed by Sweep, known as first-party cookies, and sometimes third-party cookies are set by our service providers, such as Google Analytics who provides analytics and interest-based advertising. When third-party cookies are set by service providers, they are providing a service or function to Sweep, as well as achieving the service provider's own purposes. Sweep cannot control how third-party cookies are used. You can review how Google Analytics collects and processes data by visiting: <https://policies.google.com/technologies/partner-sites>. If you don't want Google Analytics to be used in your browser, you can install the Google Analytics Opt-out Browser Ad-On by visiting: <https://tools.google.com/dlpage/gaoptout/>. In addition, you can disable Google Signals by following the instructions for turning off Ad Personalization found here.

### **How do I manage my Cookies?**

Sweep has unified our cookie management tool across all Sweep domains providing users with a central location to manage your cookie preferences. With the exception of "strictly necessary" cookies that are essential for the Services to operate, you will be able to opt-in, opt-out, or adjust your cookie preferences for all other cookie categories. Please note that disabling some cookies may cause certain features of the Services to not function properly. This tool can be accessed by clicking on the Cookie Preferences link (titled Do Not Sell or Share My Personal Information for the residents of certain US-States) located in the footer or header of each webpage.

Most web browsers also allow you to delete cookies already placed, which may delete the settings and preferences controlled by those cookies, including advertising preferences. You can find instructions to remove any cookies that have been created in the cookie folder of your browser at <https://allaboutcookies.org/manage-cookies/>.

### **Global Privacy Control**

"Global Privacy Control" (GPC) is a privacy preference you can set in your web browser to notify websites that you do not want your Personal Data shared with or sold to independent third-parties without your consent. Sweep honors GPC in those jurisdictions where its recognition is required by applicable law, such as California, Colorado and Connecticut. At this time, we do not respond to web browser "Do Not Track" signals.

## **Self-Regulatory Programs**

Service providers may participate in self-regulatory programs that provide ways to opt out of analytics and interest-based advertising, which you can access at:

United States: NAI (<http://optout.networkadvertising.org>) and DAA (<http://optout.aboutads.info/>)

Canada: Digital Advertising Alliance of Canada (<https://youradchoices.ca/>)

Europe: European Digital Advertising Alliance (<http://www.youonlinechoices.com>)

## **Web Beacons**

Most email clients have settings which allow you to prevent the automatic downloading of images, which will disable web beacons in the email messages you read.

## **Mobile Advertising IDs**

On mobile devices, advertising IDs provided by the platform may be collected and used similar to cookie IDs. You may use the controls on iOS and Android operating systems that allow you to limit tracking and/or reset the advertising IDs.

## **What types of Cookies do we use?**

Sweep utilizes four categories of cookies: strictly necessary cookies, functional cookies, performance and analytics cookies, as well as targeting and advertising cookies. You can read more about each of these types of cookies and view the cookies within each category that can be found in the Services by clicking on the Cookies Preferences link (titled Do Not Sell or Share My Personal Information for the residents of certain US-States) located in the footer or header of each webpage.

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